

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

03-MDL-1570 (GBD)(SN)

**TERRORIST ATTACKS ON
SEPTEMBER 11, 2001**

**IRAN NOTICE OF
AMENDMENT**

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This document relates to: Ashton et al v. al Qaeda Islamic Army, et al.,

No. 02-CV-6977(GBD)(SN) .

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 3237, as permitted and approved by the Court's Order of July 10, 2018, ECF No. 4045. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended to add the individual(s) listed below (the "New Plaintiff(s)") as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed amended to include the allegations, as indicated below, of (a) the Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237, or (b) the Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in

connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at Havlish v. Bin Laden, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; In re Terrorist Attacks on September 11, 2001, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

CAUSES OF ACTION

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against Iran, as set forth in the following complaint [**check only one complaint**]:

- ☒ Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237
- ☐ Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53

IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
1	Bergin, John	NY	USA	Bergin, John	Child	N/A
2	Bergin, Katie	NY	USA	Bergin, John	Child	N/A
3	Bergin, Madeline	NY	USA	Bergin, John	Spouse	N/A
4	Bergin, Shannon	NY	USA	Bergin, John	Child	N/A
5	Bogdan, Dorothy A.	FL	USA	Bogdan, Nicholas	Spouse	N/A
6	Bogdan, Dorothy A.	FL	USA	Bogdan, Nicholas	Parent and legal guardian on behalf of E.B., minor child of 9/11 Decedent Nicholas Bogdan	N/A
7	Bogdan, Nicholas	FL	USA	Bogdan, Nicholas	Child	N/A
8	Fiore Lacasse, Jessica	NJ	USA	Fiore, Michael	Child	N/A

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
9	Fiore Staiano, Cristen	NY	USA	Fiore, Michael	Child	N/A
10	Fiore, Charlene	NY	USA	Fiore, Michael	Spouse	N/A
11	Fiore, Michael	NY	USA	Fiore, Michael	Child	N/A
12	Kellett, Cameron	NY	USA	Kellett, Joseph P.	Child	N/A
13	Kellett, Julie Anne	NY	USA	Kellett, Joseph P.	Child	N/A
14	Kellett, Patricia	NY	USA	Kellett, Joseph P.	Spouse	N/A
15	Makshanov, Natalie	NY	USA	Sekzer, Jason M.	Spouse	N/A
16	Palazzo, Lisa	NY	USA	Palazzo, Jeffery M.	Spouse	N/A
17	Palazzo, Nicole	NY	USA	Palazzo, Jeffery M.	Child	N/A
18	Palazzo, Samantha	NY	USA	Palazzo, Jeffery M.	Child	N/A
19	Russin, Alec	NJ	USA	Russin, Steven	Child	N/A
20	Russin, Andrea	NJ	USA	Russin, Steven	Spouse	N/A
21	Russin, Andrea	NJ	USA	Russin, Steven	Parent and legal guardian on behalf of A.R., minor child of 9/11 Decedent Steven Russin	N/A

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
22	Russin, Andrea	NJ	USA	Russin, Steven	Parent and legal guardian on behalf of O.R., minor child of 9/11 Decedent Steven Russin	N/A
23	Tarasiewicz, Melissa	NY	USA	Tarasiewicz, Allan	Child	N/A
24	Tarasiewicz, Patricia	NY	USA	Tarasiewicz, Allan	Spouse	N/A
25	Thackurdeen, Rambascia	NY	USA	Thackurdeen, Goumatie	Parent	N/A

Dated: November 26, 2018

Respectfully submitted,

KREINDLER & KREINDLER LLP

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